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April 15, 2022

**VIA ECF**

Hon. Pamela K. Chen, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: IME Watchdog, Inc. v. Safa Gelardi, et al.  
Civil No. 1:22-cv-1032 (PKC-JRC)**

Dear Judge Chen:

We represent Defendants Safa Gelardi, Vito Gelardi, and IME Companions in the above-referenced matter. We are receipt of Plaintiff's and Third-Party Defendant Carlos Roa's motions to quash. My office forgot to send the subject subpoenas to opposing counsel prior to service, and I apologize to the Court, opposing counsel, and the witnesses for any inconvenience this has caused. Based on the lack of prior notice, I am withdrawing the subpoenas and will re-issue them when appropriate.

We also issued a subpoena to Pallorium, Inc., the private investigation company whose principal, Mr. Rambam, testified at the hearing. I am withdrawing this subpoena as well and will reissue it at the appropriate time.

By copy of this letter, I am requesting counsel for Plaintiff and counsel for Mr. Roa to kindly inform the subpoenaed witnesses that the subpoenas have been withdrawn.

Respectfully submitted,

By: /s/ Steven Siegler  
Steven Siegler, Esq.

cc: Emanuel Kataev, Esq. (via ECF)  
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